

**IN THE UNITED STATE DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Zhejiang Sairen Trading Co., Ltd.,

Plaintiff,

v.

INDIVIDUALS, PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS
ON SCHEDULE “A,”

Defendants.

Case No. 22-cv-2050

PRELIMINARY INJUNCTION ORDER

Before the Court is Plaintiff Zhejiang Sairen Trading Co., Ltd.’s (“Plaintiff”) Motion for Entry of a Preliminary Injunction enjoining Walmart and all other Defendants identified in the Amended Complaint from manufacturing, importing, distributing, offering for sale, or selling infringing products (Plaintiff’s flag holder design patent, the “Patent Design”), and for expedited discovery and asset restraint (the “Motion”). The Court, having considered the Motion, and any responses and replies thereto, finds that the Sealed Temporary Restraining Order entered in this matter (Dkt. No. 9) should be converted to a preliminary injunction and remain in place until such time as a final judgment is entered in this matter, and that such is warranted under FED. R. CIV. P. 65. The Court having considered the motion and any responses and replies therefore, finds that Plaintiff’s Motion should be GRANTED. The Court therefore orders as follows:

1. Walmart and all other Defendants identified in the Amended Complaint and their officers, affiliates, agents, and employees are hereby enjoined from:

- a. offering for sale, selling, and importing any products not authorized by Plaintiff and that include any reproduction, copy or colorable imitation of the design claimed in the Patent Design;
 - b. aiding, abetting, contributing to, or otherwise assisting anyone in infringing upon the Patent Design; and
 - c. effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in Subparagraphs (a) and (b).
2. Walmart and all other Defendants identified in the Amended Complaint and their officers, affiliates, agents, and employees and any third parties receiving actual notice of this order—including any credit card companies, banks, or payment processors— shall, within five business days of receipt of such notice, provide to Plaintiff expedited discovery, including copies of all documents and things currently in their possession, custody, or control related to:
 - a. the identities and all contact information related to Walmart and all other Defendants, and any entities having any ownership or control over the marketplace stores operated by Walmart and all other Defendants identified in the Amended Complaint, and any other accounts under the operation or control of the individuals operating the foregoing accounts, including all known contact information and all associated e-mail addresses;
 - b. the nature of Walmart and all other Defendants' and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces, Domain Names, and Walmart and all other Defendants' financial accounts, as well as providing a full

accounting of Walmart and all other Defendants' sales and listing history related to their respective Online Marketplaces and Domain Names; and

c. any financial accounts owned or controlled by Walmart and all other Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, PayPal, Alipay, Wish.com, Amazon Pay, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

3. Walmart and all other Defendants identified in the Amended Complaint and any third parties with actual notice shall, within five business days after receipt of such notice disable any and all accounts and or services used by Walmart and all other Defendants identified in the Amended Complaint to market, advertise, sell and/or offer for sale any goods that infringe the Design Patent, including any infringing goods or colorable imitations thereof.

4. Walmart and all other Defendants identified in the Amended Complaint and their officers, affiliates, agents, and employees shall be restrained and enjoined from transferring or disposing of any monies or assets until further ordered by this Court.

5. Any Third Party Providers, including PayPal Holdings, Inc. ("PayPal"), Alipay, Payoneer.com, eBay Inc., Wish.com, and Amazon Pay, shall, within five (5) business days of receipt of this Order:

a. locate all accounts and funds connected to Walmart and all other Defendants' Seller Aliases, Online Marketplaces and Domain Names, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, the e-


- mail addresses identified, and any e-mail addresses provided for Defendants by third parties; and
- b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Walmart and all other Defendants' assets until further ordered by this Court.
6. Plaintiff is authorized to issue expedited written discovery, pursuant to the Federal Rules of Civil Procedure 33, 34 and 36, related to:
- a. the identities and locations of Walmart and all other Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information, including any and all associated e-mail addresses; and
- b. the nature of Walmart and all other Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces, Domain Names, and Walmart and all other Defendants' financial accounts, as well as providing a full accounting of Walmart and all other Defendants' sales and listing history related to their respective Online Marketplaces and Domain Names.
- Plaintiff is authorized to issue any such expedited discovery requests via e-mail.
- Walmart and all other Defendants shall respond to any such discovery requests within three (3) business days of being served via e-mail.
7. Plaintiff may provide notice of these proceedings to Walmart and all other Defendants identified in the Amended Complaint, including service of process pursuant to Fed. R. Civ. P. 4(f)(3) and any future motions, by electronically publishing a link to the Amended Complaint,

this Order and other relevant documents on a website and any e-mail addresses provided for Walmart and all other Defendants identified in the Amended Complaint by third parties that includes a link to said website. The Clerk of the Court is directed to issue a single original summons in the name of “Walmart and all other Defendants identified in the Amended Complaint” that shall apply to all Defendants. The combination of providing notice via electronic publication or e-mail, along with any notice that Walmart and all other Defendants identified in the Amended Complaint receive from domain name registrars and payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Walmart and all other Defendants identified in the Amended Complaint of the pendency of the action and afford them the opportunity to present their objections

8. That Plaintiff’s bond of \$10,000 shall remain with the Court until a final judgment is entered in this matter or until this Preliminary Injunction is terminated.

9. Walmart and all other Defendants identified in the Amended Complaint that are subject to this Order may appear and move to dissolve or modify the Order as permitted by and in compliance with the Federal Rules of Civil Procedure and Northern District of Illinois Local Rules.

10. Plaintiff’s Amended Complaint (Dkt. No. 4), *Ex Parte* Motion for Entry of a Temporary Restraining Order (Dkt. No. 3), Sealed Temporary Restraining Order (Dkt. No. 9), and all other sealed docket entries and any attachments thereto are hereby unsealed.



U.S. District Court Judge
Dated: 6/22/2022

Wish

33	13672184386@163.com	https://www.wish.com/search/flag%20holder/product/60f88790e871113690ee49d8?source=search&position=918&share=web
34	66jiangyujun	https://www.wish.com/search/flag%20holder/product/618dd4692765b2339150484a?source=search&position=860&share=web
35	aimili	https://www.wish.com/search/flag%20holder/product/61921cf666e482bb3658201f?source=search&position=943&share=web
36	babaeight	https://www.wish.com/search/flag%20holder/product/618c09e7c3f52d9fafe856b7?source=search&position=717&share=web
37	BABYSEE	https://www.wish.com/search/flag%20holder/product/5f2ba67800d768003ff94281?source=search&position=891&share=web
38	Billymore	https://www.wish.com/search/flag%20holder/product/60b5d07e67fd8d577abec163?source=search&position=34&share=web
39	Butterfly's shop	https://www.wish.com/search/flag%20holder/product/5f47633f4a0aa8004145c02e?source=search&position=722&share=web
40	Caste LLPC	https://www.wish.com/search/flag%20holder/product/5f2b9f34a3816400505c4a83?source=search&position=696&share=web
41	casualshoppm all	https://www.wish.com/search/flag%20holder/product/5f730cbee1af3f1fab6408a?source=search&position=693&share=web
42	cckruer	https://www.wish.com/search/flag%20holder/product/619adc99e8e27b8150174a59?source=search&position=210&share=web
43	Charles' House	https://www.wish.com/search/flag%20holder/product/5f634138e14e1717afe8a382?source=search&position=942&share=web
44	cherlen	https://www.wish.com/search/flag%20holder/product/61939308307006afba2844ef?source=search&position=940&share=web
45	colaswag	https://www.wish.com/search/flag%20holder/product/619c318e72a1f0728775ef63?source=search&position=140&share=web
46	Crazy flag Shop	https://www.wish.com/search/flag%20holder/product/60a37025a1a4cd8d229de284?source=search&position=755&share=web
47	Dilemma	https://www.wish.com/search/flag%20holder/product/5f4a191c907a1f0039746261?source=search&position=400&share=web
48	diskday	https://www.wish.com/search/flag%20holder/product/60f839e2dcd3578004a5fa86?source=search&position=894&share=web
49	dream_studio	https://www.wish.com/search/flag%20holder/product/5d405c42338f3003ccac1a2c?source=search&position=679&share=web
50	Etimefungo	https://www.wish.com/search/flag%20holder/product/5f20e28240032426d5199913?source=search&position=874&share=web
51	fashionhomes	https://www.wish.com/search/flag%20holder/product/618c31e03b6a76839fe17bc1?source=search&position=205&share=web
52	fengyihighdream	https://www.wish.com/search/flag%20holder/product/619e48282c80d5e99d5b0949?source=search&position=908&share=web
53	ganlin	https://www.wish.com/search/flag%20holder/product/6178ed541ce7056c40c8850c?source=search&position=866&share=web
54	Gregory White	https://www.wish.com/search/flag%20holder/product/619c1925c8d927a33565afd7?source=search&position=855&share=web

55	Hanyongyous haaHe	https://www.wish.com/search/flag%20holder/product/5f082509d0af0822f51e0235?source=search&position=436&share=web
56	hilarious women	https://www.wish.com/search/flag%20holder/product/5f47633ff9ec0401e9cbdf1e?source=search&position=849&share=web
57	home_garden	https://www.wish.com/search/flag%20holder/product/5e54f473747c415c64e41367?source=search&position=897&share=web
58	home-mama	https://www.wish.com/search/flag%20holder/product/5f3364252dc7ea003a2a6cb5?source=search&position=749&share=web
59	hoyaog	https://www.wish.com/search/flag%20holder/product/5e9909f23f6d551fd3990df6?source=search&position=728&share=web
60	I have been in the construction of life	https://www.wish.com/search/flag%20holder/product/5f30a9b68f45c1ed6337ce31?source=search&position=718&share=web
61	Jaffe	https://www.wish.com/search/flag%20holder/product/5fde1058f650b9995d38d2b?source=search&position=808&share=web
62	Jazmin19	https://www.wish.com/search/flag%20holder/product/6184b97a5793dfa517824959?source=search&position=889&share=web
63	jixiantiao	https://www.wish.com/search/flag%20holder/product/618c194bcbebccff6722ba41?source=search&position=900&share=web
64	kongfukid	https://www.wish.com/search/flag%20holder/product/618c46e8348a4648ddaa5a6b?source=search&position=733&share=web
65	Krisde xyn	https://www.wish.com/search/flag%20holder/product/5f31fbb0fbd025003af11b17?source=search&position=933&share=web
66	Langwushang mujTy	https://www.wish.com/search/flag%20holder/product/5f31f9698c7cf004af4589a?source=search&position=867&share=web
67	leassou	https://www.wish.com/search/flag%20holder/product/6199a2ea754023ed62d9b3ab?source=search&position=926&share=web
68	leileixiaospng	https://www.wish.com/search/flag%20holder/product/5f680ebc35479d0fed767668?source=search&position=859&share=web
69	les-dessus- chics	https://www.wish.com/search/flag%20holder/product/5f2cef3af5b4a7004cda9b1c?source=search&position=712&share=web
70	liuhaiqingai	https://www.wish.com/search/flag%20holder/product/5d4145fa9f60a31310e1bdc0?source=search&position=12&share=web
71	liuli_store	https://www.wish.com/search/flag%20holder/product/5e54a8c9c92b1e18c62398bd?source=search&position=844&share=web
72	longyunjian	https://www.wish.com/search/flag%20holder/product/5f335e70b4cf56003ccb470b?source=search&position=935&share=web
73	louyuqiao	https://www.wish.com/search/flag%20holder/product/618c45c75677b7f1075a2313?source=search&position=745&share=web
74	luochon2017 nanzhuang	https://www.wish.com/search/flag%20holder/product/60c2bb910ba6a836f8cd0b2d?source=search&position=888&share=web
75	mofashi	https://www.wish.com/search/flag%20holder/product/619e6573e958b3e47ee64ed3?source=search&position=746&share=web

76	nangua	https://www.wish.com/search/flag%20holder/product/618c803513de73aa797663e8?source=search&position=846&share=web
77	New Lucky	https://www.wish.com/search/flag%20holder/product/5f2cb846295325004badb9ac?source=search&position=913&share=web
78	quinzmarie	https://www.wish.com/search/flag%20holder/product/6194d9aa3ceb6d368f98a4f0?source=search&position=870&share=web
79	ruoying	https://www.wish.com/search/flag%20holder/product/617b7c44c2d95b73e738928a?source=search&position=865&share=web
80	Ruozhongpin VxH	https://www.wish.com/search/flag%20holder/product/5e82e3588e8a3c32d203bc54?source=search&position=929&share=web
81	ShibixianLL	https://www.wish.com/search/flag%20holder/product/5ee45341d8a1ce052e3c39f6?source=search&position=763&share=web
82	Shiyouyawei Bh	https://www.wish.com/search/flag%20holder/product/5f28fce9fcc85c6f146aece6?source=search&position=895&share=web
83	Shoes_store	https://www.wish.com/search/flag%20holder/product/5e5f8f022c9b3b05dad5ed70?source=search&position=9&share=web
84	Superecho	https://www.wish.com/search/flag%20holder/product/60efa52f829b8888bd803434?source=search&position=103&share=web
85	tbuueryhe	https://www.wish.com/search/flag%20holder/product/5f49cd3b62830703bf4db94a?source=search&position=45&share=web
86	Trog Linpark	https://www.wish.com/search/flag%20holder/product/5f2e27563610a0003c2ac426?source=search&position=3&share=web
87	Try_Everything	https://www.wish.com/search/flag%20holder/product/5d42be5689d0661d7b224657?source=search&position=78&share=web
88	Vampire Store	https://www.wish.com/search/flag%20holder/product/5f48589bc902bc003b1fcd6f?source=search&position=843&share=web
89	weiquan	https://www.wish.com/search/flag%20holder/product/618c6df785388809d5c811a1?source=search&position=72&share=web
90	witcreator@126.com	https://www.wish.com/search/flag%20holder/product/5f3d57d75f8c7d09b55badcd?source=search&position=93&share=web
91	XiaoJafee	https://www.wish.com/search/flag%20holder/product/5fde104e2e9113b802769fc7?source=search&position=192&share=web
92	xiyoudrink	https://www.wish.com/search/flag%20holder/product/617ce941d7a589fc7a3376bb?source=search&position=902&share=web
93	yangfan	https://www.wish.com/search/flag%20holder/product/5f6b0a54ac09861392e8e806?source=search&position=136&share=web
94	yangxueqing	https://www.wish.com/search/flag%20holder/product/5d5503fb2d27290275674c48?source=search&position=0&share=web
95	yyiyaya	https://www.wish.com/search/flag%20holder/product/618c2722c186d86503d20111?source=search&position=845&share=web
96	you are beauties	https://www.wish.com/search/flag%20holder/product/5f4645e711b7d7684dd26bab?source=search&position=814&share=web
97	yuanxuanfeng bu	https://www.wish.com/search/flag%20holder/product/5f35fcc5e16b8a0c07cbe659?source=search&position=292&share=web
98	zhangmeng12	https://www.wish.com/search/flag%20holder/product/618c215c9a79fe4f67e12df6?source=search&position=886&share=web

99	zhangxiaodudu	https://www.wish.com/search/flag%20holder/product/5f28e0b97fcd70041411803?source=search&position=884&share=web
100	zoukun	https://www.wish.com/search/flag%20holder/product/5f47633f2b1cc9003af12d87?source=search&position=50&share=web